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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

PAMELA DITTMAR,

Plaintiff,

v.

CITY OF NORTH LAS VEGAS, a municipal
corporation,

Defendant.

Case No. 2:17-cv-02916-JAD-BNW

**STIPULATION AND REQUEST FOR
EXTENSION OF JOINT PRETRIAL
ORDER DEADLINE**

(Second Request) ECF No. 123

NOW COMES the Plaintiff, Pamela Dittmar, by and through her attorneys, Melanie A. Hill and Melanie Hill Law PLLC, and Defendant, City of North Las Vegas, by and through its attorneys, R. Todd Creer, Kaitlin H. Paxton, and Kamer Zucker Abbott, who hereby stipulate that the deadline for the parties to file their Joint Pretrial Order be extended from the current deadline of September 15, 2022 up to and including October 17, 2022 pursuant to Local Rule IA 6-1 and Local Rule 26-3.

This is the second request for an extension of the Joint Pretrial Order deadline. The first request was by stipulation to extend the Joint Pretrial Order deadline six weeks to allow the parties time to attend to prescheduled commitments given that the case did not resolve at the settlement conference. In support of this Stipulation and Request, the parties state as follows:

1. The Court's Order of February 24, 2022 stayed the deadline to file the Pretrial Order for ten (10) days following the mandatory settlement conference. [ECF No. 116].

2. The mandatory settlement conference was held on July 25, 2022 and the case did not resolve. Accordingly, the deadline for the Joint Pretrial Order was August 4, 2022.
3. The parties stipulated to extend the Joint Pretrial Order deadline six weeks due to counsel for Defendant's pre-scheduled commitments, including out-of-town travel, rendering them unavailable to sufficiently confer with Plaintiff's counsel to prepare the Joint Pretrial Order by the current deadline. The stipulation was a little longer to account for Plaintiff's counsel's out-of-town travel plans in September for the Labor Day holiday.
4. Counsel for Plaintiff was brought in at the last minute to assist in a two-week federal trial in late August that delayed Plaintiff's completion of the Joint Pretrial Order and meet and confer. Further, Counsel for Defendant have had to attend multiple hearings scheduled with short notice, one of which required immediate briefing, in addition to tending to a family emergency. Therefore, due to Plaintiff's counsel's schedule in late August and Defendant's counsel's schedule over the past few weeks, the parties also need additional time to meet and confer about issues in the Joint Pretrial Order and issues subject to motions in limine.
5. Thus, the parties seek a thirty (30) day extension of time, up to and including October 17, 2022, to submit their Joint Pretrial Order.
6. This Request for an extension of time is not sought for any improper purpose or other purpose of delay. Rather, it is sought by the parties solely to allow sufficient time to meet and confer and finalize the Joint Pretrial Order in this case.

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WHEREFORE, the parties respectfully request that the Court extend the Joint Pretrial Order deadline from September 15, 2022 up to and including October 17, 2022 in this matter.

DATED this 13th day of September, 2022.

MELANIE HILL LAW PLLC

KAMER ZUCKER ABBOTT

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IT IS SO ORDERED.

10/3/2022

DATE


UNITED STATES DISTRICT JUDGE

nunc pro tunc to 9/15/2022